Ciba Specialty Chemicals Corporation Expert Services 540 White Plains Road Tarrytown, New York USA 10591

RECEIVED 02PT CBIC



2007 JUL -5 AM 9: 14

201-16607

June 19, 2007

Administrator
U.S. Environmental Protection Agency
Ben Franklin Post Office
P.O. Box 862
Washington, DC 20044
Attention: Chemical Right-to-Know Program
HPV Challenge Program

Subject: Request to transfer Irganox 1010 (CAS 6683-19-8) from the EPA HPV Program to OECD [HPV Company Registration Number [100]]

Dear HPV Coordinator:

Ciba Specialty Chemicals Corporation supports EPA's HPV program and has made a public commitment to sponsor a number of chemicals under the program. In May 2000, Ciba Specialty Chemicals submitted a test plan and robust summaries for Irganox 1010 (Pentaerythritol tetrakis(3-(3,5-di-tert-butyl-4-hydroxyphenyl)propionate). The test plan and robust summaries for Irganox 1010 were reviewed by the agency and are available on EPA's HPV web site.

We are currently also in the process of supporting Irganox 1010 in the International OECD SIDS program. Irganox 1010 was discussed at the SIAM 23 in October 2006 (SIAM 23, Korea). The enclosed document is a summary of the conclusions on Irganox 1010 at SIAM 23. This and other information on the status of the chemical are available on the OECD website (http://cs3-hq.oecd.org/scripts/hpv/).

We believe that to maintain accuracy and consistency, the robust summaries and related information should be maintained in just one HPV system. Therefore, Ciba Specialty Chemicals would like to request that Irganox 1010 be removed from EPA's HPV program and supported only through the OECD SIDS program.

Please let me know if you have any comments or need additional information.

Sincerely yours,

Richard Balcomb Head, Toxicology and Environmental Assessments

Enclosure